

# EXHIBIT B

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

IQVIA HOLDINGS INC.,

and

PROPEL MEDIA, INC.,

Defendants.

Case No. 1:23-cv-06188-ER

**DECLARATION OF CHRISTOPHER PAQUETTE IN SUPPORT OF DEFENDANTS’  
RESPONSE TO PLAINTIFF’S LETTER REQUESTING A PRE-MOTION  
CONFERENCE REGARDING THE TEMPORARY RESTRAINING ORDER**

I, Christopher Paquette, pursuant to 28 U.S.C. § 1746, hereby declare and state as follows:

1. My name is Christopher Paquette. I am over the age of twenty-one years and of sound mind. The statements set forth in this declaration are true and within my personal knowledge. If called as a witness, I would and could competently testify to the matters set forth herein.

2. I am the Chief Executive Officer of DeepIntent Technologies, Inc., which is owned by Propel Media, Inc. (“DeepIntent”).

3. The Federal Trade Commission has imposed an enormous burden on DeepIntent, a relatively small company, over the past 10 months. The FTC has demanded and received more than 850,000 documents during the agency’s investigation, over 4 million pages of material. These have come from nearly 10% of the company’s workforce, including a majority of senior

leadership. Additionally, DeepIntent has provided nearly a terabyte of data. And three key executives, including me, have been deposed.

4. The Federal Trade Commission's investigation has come at an enormous cost to DeepIntent. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED].

5. DeepIntent could only feasibly continue with this litigation into early December [REDACTED]

[REDACTED]

[REDACTED].

6. Any further delay in closing the proposed transaction between IQVIA and DeepIntent would be prohibitively costly in terms of time, resources, and personal strain on DeepIntent company executives.

7. As we get closer to December, the company will have to prepare for a second, costly, administrative trial at the Federal Trade Commission Office of Administrative Law Judges, which is scheduled to start December 20, 2023. My understanding is that if it were to move forward, the administrative trial could last weeks and would most likely require DeepIntent

[REDACTED].

8. The fourth quarter of the year is also a critical time for DeepIntent's business. Many of DeepIntent's advertising customers plan their advertising budgets for fiscal year 2024 during the second half of 2023. [REDACTED]

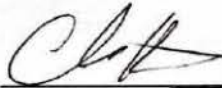
[REDACTED]

[REDACTED].

9. [REDACTED]

[REDACTED] – while the company is still healthy and growing, continued delay could [REDACTED]. Customers can switch to many other competitors with the flip of a virtual switch.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 28th day of August, 2023, in New York, New York.



Christopher Paquette  
DeepIntent Technologies, Inc.



**CERTIFICATE OF SERVICE**

I hereby certify that, on August 28, 2023, I served the foregoing document on the following counsel via electronic mail:

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/s/ Chantale Fiebig  
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